## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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) Civil Action No. 1:24-cv-01340-JKB
) ) ) JURY TRIAL DEMANDED )
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## PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT QIANSHAN COUNTY HANYING TRADING CO., LTD

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Jet Creations, Inc. ("Plaintiff" or "Jet Creations") requests that the Clerk enter default with respect to the Defendant Qianshan

County Hanying Trading Co., Ltd ("Defendant") As grounds for this request Jet Creations states as follows:

- 1. Jet Creations filed its complaint on May 8, 2024 (DCK1)
- 2. A summons was issued and, as the Court's docket reflects, the Defendant was duly served with process on 11/18/2024 (DCK 30).
- 3. An answer or responsive pleading was due from Defendant on or before 01/18/2025 or within 60 days from the service date.
- 4. Defendant has failed to tender an answer or otherwise plead in this cause within the time required.
  - 5. Plaintiff seeks to have default entered against Defendant.

Wherefore, since more than 60 days have elapsed since the service of the summons and Complaint and no responsive pleadings have been filed, entry of default is appropriate.

April 16, 2025

Respectfully Submitted,

/s/ Andrew C. Aitken
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Attorneys for Jet Creations, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that copy of the Plaintiff's Request for Entry of Default was sent via USPS Priority Mail Express along with tracking number EY471683224US to the Defendant Qianshan County Hanying Trading Co., Ltd at Address: CN No. 12, Hongqiao Village, Hongqiao Township, Qianshan County, Shangrao City, Jiangxi Province, China on April 25, 2025.

April 28, 2025

/s/ Justin King Justin King, Esq. (# 31390) WPAT, PC. 8230 Boone Blvd., Suite 405 Vienna, VA 22182 jking@wpat.com